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Counsel for YYP Group, Ltd.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS

IN RE:	§	
	§	CASE NO. 19-40007-mxm
CGE REAL ESTATE HOLDINGS, LLC	§	
	§	Chapter 11
DEBTOR.	§	
<hr/>		
YYP GROUP, LTD.	§	
Movant	§	
	§	
v.	§	<i>Hearing set for</i>
	§	<i>March 14, 2019; 1:30 p.m.</i>
CGE REAL ESTATE HOLDINGS, LLC	§	
Respondent.	§	

WITNESS AND EXHIBIT LIST OF YYP GROUP, LTD.

Creditor YYP GROUP, LTD. ("Movant") hereby designates the following witnesses and exhibits for the scheduled hearing on **March 14, 2019 at 1:30 p.m.** before the Honorable Mark X. Mullin, U.S. Bankruptcy Judge. The following matter has been set for hearing:

- A. Motion for Relief from Automatic Stay as to Real Property Located at 3624 Shenandoah Street in Dallas, Texas 75205 filed by YYP Group, Ltd. [*Docket No. 10*] filed on January 23, 2019.

WITNESSES

Witness
1. George Kimeldorf or other representative of YYP Group, Ltd.
2. All witnesses necessary for rebuttal.

Witness	
3.	All witnesses presented by other parties not objected to by YYP Group, Ltd.
4.	Debtor representative

EXHIBITS

No.	Description
1.	Real Estate Lien Note in the original principal sum of \$1,400,000.00 dated July 27, 2018, and executed by Debtor
2.	Deed of Trust dated July 27, 2018, and executed by Debtor
3.	Assignment of Rents and Leases dated July 27, 2018, and executed by Debtor
4.	Temporary Forbearance Agreement dated December 3, 2018, and executed by Debtor
5.	Deed of Trust and Assignment of Rents dated November 1, 2018, and executed by Debtor as Trustor and UCR Group, LLC as Beneficiary
6.	Schedules and Statement of Financial Affairs filed by Debtor
7.	All exhibits introduced by other parties not objected to by YYP Group, Ltd.
8.	All filings in this bankruptcy case
9.	All exhibits necessary for rebuttal

Additionally, Movant expressly reserves the right to amend and add additional witnesses and exhibits including witnesses or exhibits listed by any other party and/or rebuttal or impeachment witnesses and exhibits, as they are determined to be relevant or helpful by Movant or the Court. Movant reserves the right to use any documents filed in the bankruptcy case subsequent to the filing and serving of this witness and exhibit list, and to move the Court for additional relief, if necessary, including asking the Court to take judicial notice of any documents, pleadings, entries, or orders entered in the bankruptcy case. Movant objects to judicial notice of documents, affidavits, or other evidence filed with the Court that is not available for cross-examination purposes.

DATED March 11th, 2019.

Respectfully submitted,

JONES, ALLEN & FUQUAY, L.L.P.

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By: /s/ Laura L. Worsham

Laura L. Worsham

State Bar No. 22008050

Attorneys for YYP GROUP, LTD.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above Witness and Exhibit List has been served on the parties set forth below electronically and as otherwise set out, this 11th day of March, 2019:

U.S. Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242

By Notice of Electronic Filing

Eric A. Liepins
Counsel for Debtor
12770 Coit Road, Suite 1100
Dallas, TX 75251

By Notice of Electronic Filing

CGE Real Estate Holdings, LLC
Debtor
8412 Desert Falls
Fort Worth, TX 76137
First Class Mail

Laurie A. Spindler
Counsel for Tarrant and Dallas Counties
Linebarger Goggan Blair & Sampson, LLP
2777 N. Stemmons Frwy., Suite 1000
Dallas, TX 75207

By Notice of Electronic Filing

Eboney Cobb
*Counsel for Town of Highland Park and
Highland Park ISD*
Perdue, Brandon, Fielder, Collins & Mott, LLP
500 E. Border Street, Suite 640
Arlington, TX 76010
By Notice of Electronic Filing

/s/ Laura L. Worsham

Laura L. Worsham